

October 2, 2024

**Via ECF**

Honorable Eric N. Vitaliano  
United States District Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Steinberg, et al. v. Qatar Charity, Qatar National Bank, and Masraf al Rayan*,  
1:24-cv-04999-ENV-SJB**

Dear Judge Vitaliano:

We are co-counsel for the Plaintiffs in the above-captioned action, in which the estate and immediate family members of the late Max D. Steinberg assert claims under the Anti-Terrorism Act, 18 U.S.C. § 2331 *et seq.*, against three Qatari Defendants for their alleged roles in providing financial support to the terrorist organization that murdered Mr. Steinberg.

As the State of Qatar is not a party to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents, Plaintiffs intend to move this Court for an order authorizing service of process on the Defendants' United States legal counsel pursuant to Fed. R. Civ. P. 4(f)(3) or, in the alternative, for issuance of letters rogatory pursuant to 28 U.S.C. § 1781 and Rule 4(f)(2)(B) directing the appropriate Qatari authority to effectuate service on the Defendants in Qatar.

We have notified the attorneys who have appeared as counsel of record for the Defendants in two other cases currently pending in this District of our intention to seek this relief.<sup>1</sup> Those attorneys, who are copied on this letter, have indicated that they oppose Plaintiffs' application for service pursuant to Rule 4(f)(3), but have declined to respond to our repeated requests (on September 18, 24, and 26, and October 1) that they confer with us in accordance with the Court's Individual Motion Practices and Rules regarding the briefing schedule for Plaintiffs' anticipated

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<sup>1</sup> Those two cases are *Force et al. v. Qatar Charity, Qatar National Bank, and Masraf Al Rayan*, No. 1:20-cv-02578-BMC and *Henkin, et al. v. Qatar Charity, Qatar National Bank, and Masraf Al Rayan*, No. 1:21-cv-05716-RER-VMS. The same counsel appeared for Defendants in a third case in this District, which was dismissed on July 7, 2023. See *Przewozman et al. v. Qatar Charity, Qatar National Bank, and Masraf Al Rayan*, No. 1:20-cv-6088-NGG-TAM.

Honorable Eric N. Vitaliano  
October 2, 2024  
Page 2

motion. We therefore propose, for the Court's approval, that Plaintiffs' anticipated motion should be briefed in accordance with Local Civil Rule 6.1(b) as follows:

- Plaintiffs' moving papers to be served via e-mail within 2 days after the Court issues an order on the briefing schedule for Plaintiffs' motion;
- Defendants' opposition or response papers to be served via e-mail within 14 days after service of Plaintiffs' moving papers; and
- Plaintiffs' reply papers to be served via email within 7 days after service of Defendants' opposition papers.

Respectfully submitted,

/s/ Patrick L. Rocco

Attachment: Declaration of Service

CC: Via e-mail and First Class Mail (without attachment)

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